

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

In re: DOWLING COLLEGE, Debtor,	Bankr. Case No. 8-16-75545-REG Chapter 11
---	--

WARN ACT CLAIMANTS' RESERVATION OF RIGHTS

Plaintiff Lori Zaikowski and the WARN Act Claimants (collectively “WARN Claimants”), who are former employees of Dowling College (“Dowling College” or “Debtor”), hereby reserve their rights to file an objection to the Emergency Order (I) Authorizing Debtor to Obtain Postpetition Financing and Use Cash Collateral, (II) Granting Adequate Protection, (III) Scheduling an Interim Hearing, and (IV) Granting Certain Related Relief (Docket No. 63) in the event that a creditors committee is not formed, or is formed and files no objection.

Dated: December 8, 2016

Respectfully submitted,

By: /s/ Jack A. Raisner
Jack A. Raisner
René S. Roupinian
Outten & Golden LLP
685 Third Avenue, 25th Floor
New York, New York 10017
Telephone: (212) 245-1000
Email: jar@outtengolden.com
Email: rsr@outtengolden.com

Attorneys for Plaintiff and the WARN Act Claimants